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Temujin Cayman and
the individual defendants

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

ARIEL ABITTAN

PLAINTIFF.

V.

LILY CHAO ET AL.,

DEFENDANTS.

and

EIAN LABS INC.,

CRIMINAL DEFENDANT.

Case No.: 5:20-CV-09340-NC

**DECLARATION OF CRAIG A. HANSEN
IN SUPPORT OF STIPULATION AND
JOINT REQUEST TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
RELATED DEADLINES**

Judge: Hon. Nathanael M. Cousins

1 I, Craig A. Hansen, hereby declare:

2 1. I am an attorney admitted to practice before this Court and an attorney at the law firm
3 of Hansen Law Firm, P.C., which represents Temujin Labs Inc. (Cayman) (“Temujin Cayman”) and
4 the individual defendants. I have personal knowledge of the matters set forth in this declaration and,
5 if called upon to do so, could and would testify competently as to the matters described below.

6 2. My firm, the Hansen Law Firm, P.C., counsel for Defendants was recently retained to
7 substitute for Defendants’ prior counsel, Culhane Meadows PLLC for the instant civil action, and
8 submitted the Notice of Change of Counsel on October 15, 2021 (Dkt. 98). Counsel for the
9 Defendants is in the process of getting up to speed as quickly as possible on this matter.

10 3. Pursuant to this Court’s Order Setting Initial Case Management Conference and ADR
11 Deadlines (“Scheduling Order”) (Dkt. 3), the parties must meet and confer regarding initial
12 disclosures, early settlement, ADR process selection, and discovery plan no later than 21 days before
13 the Case Management Conference. The parties must file a Case Management Statement pursuant to
14 the Standing Order for All Judges of the Northern District of California regarding the Contents of
15 Joint Case Management Statement no later than 7 days before the Case Management Conference.

16 4. Defendants’ undersigned counsel understands that the Rule 26(f) conference has not
17 yet occurred and is already out of time. Defendants need to prepare positions and the parties’ counsel
18 need to meet in order to satisfy Rule 26(f) sufficiently before deadlines relating to the Case
19 Management Statement and the Case Management Conference.

20 5. In light of the foregoing, Defendants request a short continuance to conduct a meet
21 and confer among current counsel for the undersigned regarding initial disclosures and a discovery
22 plan.

23 6. The undersigned counsel for Defendants has sought and received Plaintiff’s consent
24 to a relatively short continuance of the Case Management Conference, namely, from the current date
25 of November 17, 2021 to December 8, 2021. Under this proposal—which mirrors the Scheduling
26 Order—the parties must meet and confer regarding initial disclosures and a discovery plan by
27 November 17, 2021. The last day to file a Rule 26(f) Report, complete initial disclosures or state
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1 objections in a Rule 26(f) Report, and the last day to file a Case Management Statement shall be
2 December 1, 2021.

3 7. On March 5, 2021, Dkt. 22, the Court continued the Initial Case Management
4 Conference set for March 17, 2021 to April 28, 2021.

5 8. On April 21, 2021, Dkt. 44, the Court entered a Modified Order re 43 Stipulation
6 Setting Schedule and Extending Time to Respond. The Court continued the Case Management
7 Conference set for April 28, 2021 to July 7, 2021.

8 9. On June 28, 2021, Dkt. 67, the Clerk issued a Notice continuing the Case
9 Management Conference set for July 7, 2021 to July 28, 2021.

10 10. On July 19, 2021, Dkt. 79, the Clerk issued a Notice continuing the Case
11 Management Conference set for July 28, 2021 to October 6, 2021.

12 11. On September 29, 2021, Dkt 90, the Court granted the parties' Stipulation and Joint
13 Request to Continue the Case Management Conference set for October 6, 2021 to November 17,
14 2021.

15 12. The undersigned counsel for Defendants understands that no discovery has been
16 served in this action, and therefore no discovery deadlines would be affected.

17 13. As there has not yet been a Case Management Conference, the undersigned counsel
18 understands no other deadlines in this civil action have been established.

19 14. I submit this declaration in support of the accompanying Stipulation and Joint
20 Request to Continue Case Management Conference and Related Deadlines without prejudice to
21 Temujin Cayman's and the individual defendants' rights as to, and intending to waive no arguments
22 with respect to, service and jurisdiction.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.

25 Executed this 10th day of November, 2021, at San Jose, California.

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By: /s/ Craig A. Hansen
Craig A. Hansen